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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DANIELA TITO AND JACK PAUL
MCLAUGHLIN,

Defendants.

Case No.: 2:21-cr-00082-GMN-EJY

**Stipulation for Extension of Time
(Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou, United States Attorney, and Andrew W. Duncan, Assistant United States Attorney, counsel for the United States of America, Thomas F. Pitaro, counsel for defendant Daniela Tito, and James Oronoz, counsel for Defendant Jack Paul McLaughlin, that the date for the Government to file a response to the Defendant's Motion to Suppress (ECF No. 47) be extended for twenty-eight days, specifically to **May 9, 2022**.

This stipulation is entered for the following reasons:

1. The Defendant's Motion to Suppress was filed and served on March 7, 2022. *See* ECF No. 47. The Government's response deadline is presently April 11, 2022.
2. The parties are in negotiations to resolve the case.

3. The parties need additional time to attempt to resolve the matter without litigating pre-trial motions.
4. Government Counsel needs additional time to conduct investigation and research to adequately respond to the Defendant's motion.
5. The additional time requested herein is not sought for purposes of delay, but to allow counsel and the defendants sufficient time to resolve the case.
6. The additional time requested herein is not sought for purposes of delay, but to allow the Government time to adequately respond to the Defendant's motion.
7. Trial in this matter is not scheduled until July 11, 2022.
8. Additionally, denial of this request for continuance could result in a miscarriage of justice.
9. This is the second stipulation filed herein to continue the Government's response deadline.
10. The parties agree to the extension of time.

DATED: April 7, 2022

Respectfully submitted,

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Andrew W. Duncan

ANDREW W. DUNCAN
Assistant United States Attorney

/s/ Thomas F. Pitaro

THOMAS F. PITARO
Counsel for Defendant
Daniela Tito

/s/ James Oronoz

JAMES ORONOS
Counsel for Defendant
Jack Paul McLaughlin

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:21-cr-00082-GMN-EJY
)	
Plaintiff,)	
)	
v.)	
)	
DANIELA TITO AND JACK PAUL)	
MCLAUGHLIN)	
)	
Defendants.)	
_____)	

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Defendant's Motion to Suppress was filed and served on March 7, 2022. *See* ECF No. 47. The Government's response deadline is presently April 11, 2022.
2. The parties are in negotiations to resolve the case.
3. The parties need additional time to attempt to resolve the matter without litigating pre-trial motions.
4. Government Counsel needs additional time to conduct investigation and research to adequately respond to the Defendant's motion.
5. The additional time requested herein is not sought for purposes of delay, but to allow counsel and the defendants sufficient time to resolve the case.
6. The additional time requested herein is not sought for purposes of delay, but to allow the Government time to adequately respond to the Defendant's motion.

7. Trial in this matter is not scheduled until July 11, 2022.

8. Additionally, denial of this request for continuance could result in a miscarriage of justice.

9. This is the second stipulation filed herein to continue the Government's response deadline.

10. The parties agree to the extension of time.

For all of the above-stated reasons, the ends of justice would best be served by a continuance of the Government's response deadline.

CONCLUSIONS OF LAW

The additional time requested herein is not sought for purposes of delay, but to allow the Government adequate time to respond to the Defendant's motion and to allow the parties to negotiate a resolution of the case. The failure to grant said continuance would likely result in a miscarriage of justice.

ORDER

IT IS THEREFORE ORDERED that the previously scheduled response deadline for the Government to respond to the Defendant's Motion to Suppress is extended until May 9, 2022.

DATED this 7th day of April 2022.


HONORABLE ELAYNA J. YOUCHAH
UNITED STATES MAGISTRATE JUDGE